

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-
v.	:	DATE FILED: September 16, 2008
WILLIAM GOULD	:	VIOLATION:
	:	18 U.S.C. § 245 (threats interfering with
	:	federally protected activities - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant WILLIAM GOULD was employed as an electrician at the Children's Hospital of Philadelphia ("CHOP").
2. DS, a person known to the grand jury, was employed at CHOP. DS is an African-American man.
3. On August 11, 2008, DS went to a work station in room 1303 of the Abramson Research Building on CHOP's campus, where DS maintained a locker. When DS opened the door to the shop area of the workstation, DS immediately saw a life-size hangman's noose hanging from a light fixture just above DS's head directly behind the doorway. DS immediately felt intimidated and recognized the noose as representing the lynching of African-Americans.

4. On or about August 11, 2008, in the Eastern District of Pennsylvania,
defendant

WILLIAM GOULD,

by force and threat of force, willfully intimidated and interfered with, and attempted to intimidate and interfere with, DS, an African-American man, because of DS's race and color, and because DS was and had been enjoying employment and any perquisite thereof, by a private employer, that is, defendant GOULD hung a hangman's noose in a work area where DS would find it at DS's place of employment.

In violation of Title 18, United States Code, Section 245(b)(2)(C).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney

GRACE CHUNG BECKER
Acting Assistant Attorney General
Civil Rights Division